

March 9th 2004

ELECTRONICALLY FILED

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ex Parte Communication : ET Docket 03-137

Proposed Changes in the Commissions Rules Regarding Human Exposure to
Radiofrequency Fields.

Dear Ms. Dortch:

On February 18th, we met with Dr. Robert Cleveland of the Office of Engineering and Technology. The purpose of this meeting was to discuss the above mentioned NPRM and several aspects pertaining to specific parts of the document.

These issues included

- 1) 802.11a, b, g radios and the application of the duty cycle in SAR testing. Specifically that the duty cycles in 802.11a and g standard would be similar to the duty cycle for an 802.11b radio. This answers specifically the question raise by Aprel labs in there reply comments.
- 2) Discussion on the exemption limit of 100mW and that our research supported the exemption but only up to 100mW "EIRP" at the maximum. Also that the exemption in our view was not one of avoiding testing (though in some case's with low power systems testing may not be required unless co-located) but an exemption of having the data reviewed by a third party such as a TCB or the FCC before certification of the product.
- 3) Discussed on continuing research with the FCC lab with members of the Information Technology Industry Council. In part this research data will include specifically 5GHz RLAN issues but is not complete at this time .

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

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cc: Robert Cleveland